

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: BOSTON SCIENTIFIC CORP.
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION**

MDL NO. 2326

UNOPPOSED MOTION FOR APPROVAL OF QUALIFIED SETTLEMENT FUND SUB-ACCOUNT

Sanders Phillips Grossman, LLC (“**SPG**”), as counsel for certain Plaintiffs in this MDL 2326, hereby moves this Court for an Order to aid in the efficient processing and administration of a confidential settlement agreement (the “**MSA**”) between SPG and Boston Scientific Corporation and its related and affiliated entities (“**BSC**”) as defined in the MSA, (collectively, the “**Parties**”) to resolve the claims of those certain Plaintiffs against BSC relating to pelvic mesh products¹:

Currently pending before this Court in MDL 2187 is a motion for approval to create the SPG TVM Settlement Fund (“**QSF**”). The Order, once approved, will create the use of a single qualified settlement fund for other SPG pelvic mesh settlements, with separate Sub-Accounts to be created for each settlement with a different defendant. At this time, SPG seeks from this Court an Order 1) approving the creation of the SPG TVM Settlement Fund BSC Sub-Account (the “**BSC Sub-Account**”) within the QSF. BSC has no objection.

For the foregoing reasons, the Parties respectfully request this Court to approve the establishment of the BSC Sub-Account as part of the QSF, and enter an Order in the form submitted with this Unopposed Motion.

Respectfully submitted,

s/Randi Kassan

Randi Kassan
Marc Grossman

¹ The Settlement Agreement is not being filed with this Court because it contains confidential terms. Disclosing such confidential information would be inconsistent with this Court’s stated goals to achieve a resolution of claims in this MDL through confidential negotiation and settlement.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that August 31, 2017, a copy of the foregoing **UNOPPOSED MOTION FOR APPROVAL OF QUALIFIED SETTLEMENT FUND SUB-ACCOUNT** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/Randi Kassan

Randi Kassan

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